

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

VISUAL TELECOMMUNICATIONS)
NETWORK, INC.,)

Plaintiff,)

v.)

ARMAN DAIE,)

Defendant/Counter-Plaintiff.)

Civil Action No. 1:08CV 1188

MOTION TO WITHDRAW AS COUNSEL

COMES NOW James F. Davis, Esquire, and the law firm of Greenspun, Shapiro, Davis & Leary, P.C., counsel for Arman Daie, the Defendant/Counter-Plaintiff herein, and moves this Court entry of an Order granting leave of Court to James F. Davis, Esquire, and the law firm of Greenspun, Shapiro, Davis & Leary, P.C., to withdraw as counsel for the Defendant/Counter-Plaintiff, Arman Daie, and in support thereof states as follows:

1. Arman Daie cannot fulfill his obligations to the law firm of Greenspun, Shapiro, Davis & Leary, P.C.
2. As a result, relations between counsel and client have been strained to the point where counsel can no longer act as an efficient or effective advocate for Mr. Daie in this case.
3. Further, the continued representation of Mr. Daie by James F. Davis, Esquire, and the law firm of Greenspun, Shapiro, Davis & Leary, P.C., constitutes a financial hardship upon the firm.

4. Opposing counsel has previously indicated that it does not oppose the motion to withdraw as counsel.

5. Upon entry of an Order permitting James F. Davis, Esquire, and the law firm of Greenspun, Shapiro, Davis & Leary, P.C., to withdraw as counsel for Mr. Daie, all future pleadings and correspondence to Mr. Daie should be mailed first class, postage prepaid to Arman Daie, 1360 N. Crescent Heights Blvd., Apt 2A, Los Angeles, CA 90046.

Respectfully Submitted,
James F. Davis

GREENSPUN, SHAPIRO, DAVIS & LEARY, P.C.

BY: /s/
James F. Davis
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Dated: April 2, 2009

